

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JACOB and JAMES JUNG, as
Administrators of the Estate of LOUIS
JUNG, JR,

Plaintiff,

v.

CITY OF PHILADELPHIA; YesCare Corp.;
BLANCHE CARNEY, Former
Commissioner of Philadelphia Dept. of
Prisons; LALITHA TRIVIKRAM;
MAUREEN GAY; MARIESHA
APOLLON; BLAIR CABELLOS; GENA
FRASIER; WANDA BLOODSAW,

Defendants.

No. 2:24-cv-05618-TJS

JURY TRIAL DEMANDED

**PLAINTIFFS' MOTION TO COMPEL DISCOVERY FROM DEFENDANT YESCARE
CORP.**

Pursuant to Federal Rules of Civil Procedure 37(a)(3)(B), Plaintiffs move this court for an order that Defendants comply with the following discovery requests due to their untimely and insufficient responses:

Request for Production No. 2: All documents pertaining to or referencing Louis Jung, Jr. in YesCare's possession, specifically any Sentinel Report or other review, inquiry, or assessment of the circumstances surrounding the death of Louis Jung, Jr.

YesCare, Corp. has produced medical records pertaining to Mr. Jung, but has yet to produce any review of his death despite indicating that one likely exists.

Request for Production No. 3: All documents pertaining to the operation of the Pharmacist-Directed Diabetes Initiative at PDP facilities between January 1, 2020 and December 31, 2023.

YesCare, Corp. has yet to identify whether any such documents exist, although the contract it holds with the City indicates that this initiative was to be in operation within the Philadelphia Department of Prisons.

Request for Production No. 6: Any investigation, audit, assessment, evaluation, report, analysis, or any inquiry into the provision of diabetes care within PDP facilities conducted by YesCare or its predecessor between January 1, 2015 and the present, including Qualify Assurance plans and Performance Improvement Plans.

YesCare, Corp. has produced audits on its diabetes care that post-date the death of Mr. Jung, which occurred on November 6, 2023, but has not produced any from prior to Mr. Jung's death, nor has it indicated if any such audits exist.

YesCare, Corp. has not produced any Quality Assurance plans or Performance Improvement Plans pertaining to its provision of medical services within the Philadelphia Department of Prisons.

Request for Production No. 7: All Performance Improvement Plans produced by YesCare Corp. or its predecessor, Corizon, pertaining to the provision of medical care in PDP facilities between January 1, 2018 and December 31, 2023.

YesCare, Corp. has not produced any Performance Improvement Plans pertaining to its provision of medical services within the Philadelphia Department of Prisons, although such plans are contractually required.

YesCare, Corp, has not indicated if any comparable assessments exist under a different name either.

Request for Production No. 10: As narrowed via email sent by Plaintiffs' counsel to counsel for YesCare Defendants on June 6, 2025: All medical records in possession of YesCare pertaining to admissions to and treatment within an outside medical facility such as a hospital that involve patients with Type 1 or Type 2 diabetes between January 1, 2020 and December 31, 2023.

YesCare, Corp. has not produced any responsive records, nor does it appear it has even conducted a search for such records.

Accordingly, and for the further reasons provided in the brief accompanying this Motion, Plaintiffs hereby move to compel this discovery. *See* Fed. R. Civ. P. 37(a)(1) (authorizing motions “for an order compelling disclosure or discovery”).

Respectfully submitted,

/s/ Bret Grote

Bret Grote (PA 317273)

/s/ Nia Holston

Nia Holston (PA 327384)

/s/ Rupalee Rashatwar

Rupalee Rashatwar (PA 331085)

/s/ Margaret Hu

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CERTIFICATE OF SERVICE

I, Bret Grote, hereby certify that on June 17, 2025, I caused to be served a true and correct copy of the foregoing Plaintiffs' Motion to Compel to the following via the Court's ECF system:

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/s/ Bret Grote
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CERTIFICATE PURSUANT TO RULE 37(a)

I, Bret Grote, hereby certify that Plaintiffs' counsel conferred with counsel for YesCare Defendants via multiple letters, emails, and a telephonic conference in a good-faith effort to resolve the discovery issues that are the subject of this motion.

/s/ Bret Grote

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